

EXHIBIT 171

1 MORGAN, LEWIS & BOCKIUS LLP
2 KENT M. ROGER, State Bar No. 95987
3 DIANE L. WEBB, State Bar No. 197851
MICHELLE PARK CHIU, State Bar No. 248421
JASON B. ALLEN, State Bar No. 251759
One Market, Spear Street Tower
San Francisco, CA 94105-1126
Tel: 415.442.1000
Fax: 415.442.1001
E-mail: kroger@morganlewis.com
dwebb@morganlewis.com
mchiu@morganlewis.com
jason.allen@morganlewis.com

8 Attorneys for Defendants
9 HITACHI, LTD.
HITACHI DISPLAYS, LTD.
HITACHI ASIA, LTD.
HITACHI AMERICA, LTD.
HITACHI ELECTRONIC DEVICES (USA), INC.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. C07-5944 SC

MDL NO. 1917

Judge: Hon. Samuel Conti

Special Master: Hon. Charles A. Legge (Ret.)

**DECLARATION OF DARYL
CHAMBERS IN SUPPORT OF THE
HITACHI DEFENDANTS'
EVIDENTIARY PROFFER**

20 This Document Relates To:
21
ALL ACTIONS

22
23 **DECLARATION OF DARYL CHAMBERS**

24 I, Daryl Chambers, declare:

25 1. I am the Director of Finance and Accounting for the Digital Media Division of
26 Hitachi America, Ltd. ("HAL"). I make this declaration in support of the Hitachi Defendants'
27 proffer. I have personal knowledge of the facts contained in this declaration, except for those if
any, based on information and belief, and, if called as a witness, would and could competently

28 DB2/22081003.4

MDL 1917

DECLARATION OF DARYL CHAMBERS IN SUPPORT OF
THE HITACHI DEFENDANTS' EVIDENTIARY PROFFER

2 From April 1, 1999 to March 31, 2006, I was responsible for accounting and
3 financial reporting in connection with the operations of the Home Electronics Division of HAL
4 ("HAL-HED")

5 3. HAL-HED sold CPT televisions during the period April 1999 to 2005. HAL did
6 not sell CPT televisions prior to April 1999 or after 2005.

7 4. HAL-HED virtually ceased all sales of CPT televisions by the end of 2003. In
8 2004 and 2005, HAL-HED's CPT television sales activities were limited to sales of nominal
9 quantities of obsolete unsold on-hand inventory of CPT televisions remaining from prior years
10 (2004: 50 units; 2005: 6 units).

11 5. I am informed and believe that HAL-HED sold CPT televisions to customers in
12 the United States, Mexico, and perhaps other Latin American countries.

13 6. HAL-HED functioned only as a sales division of HAL. HAL-HED never
14 manufactured any components or products, including CPT tubes or CDT tubes, or CPT
15 televisions or CDT computer monitors.

16
17 I declare under the penalty of perjury under the laws of the United States of America and
18 the State of California that the foregoing is true and correct.

19 Executed this 7th day of December, 2010, in Chula Vista, CA

20
21 

22 Daryl Chambers

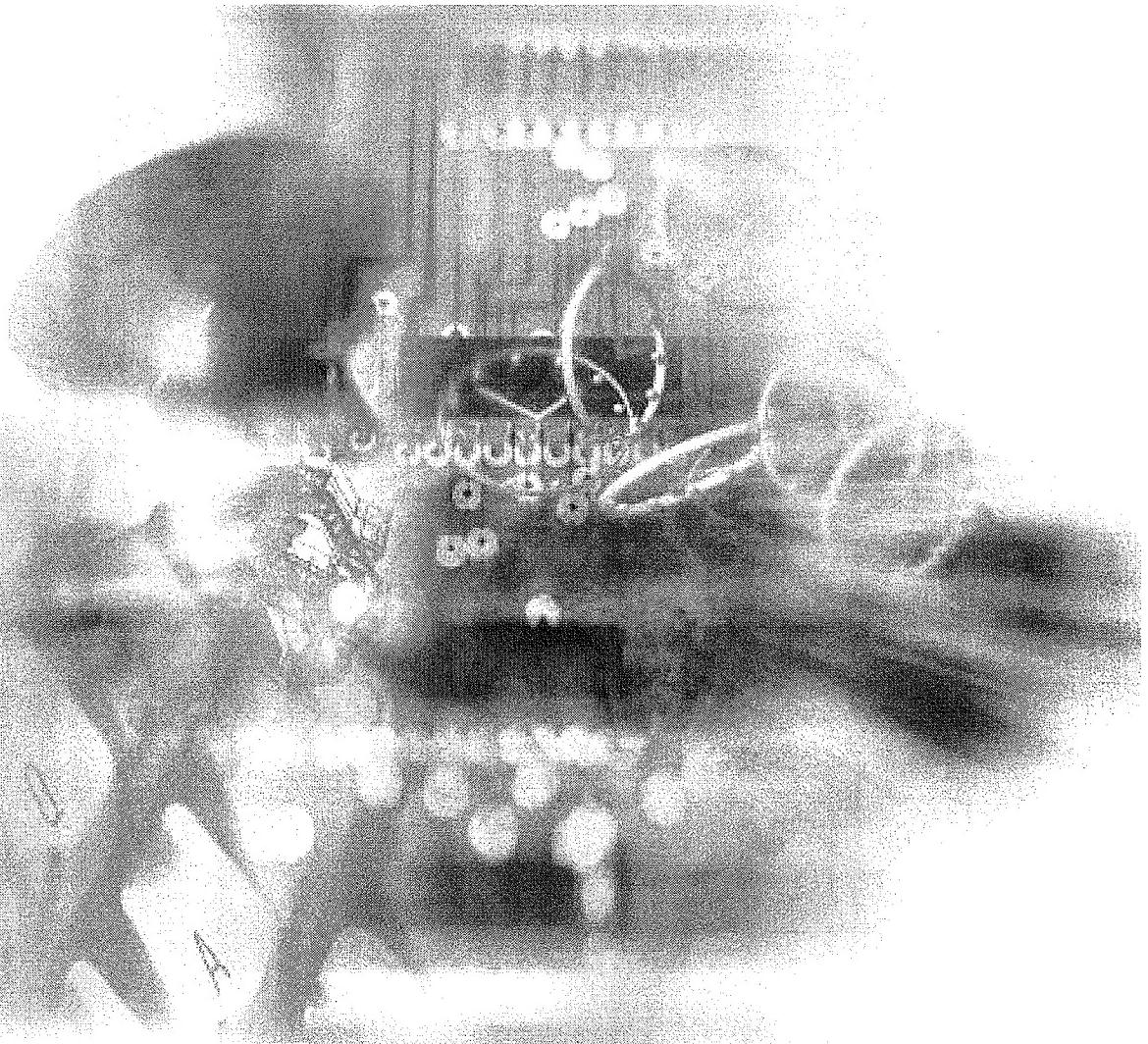
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28

MORGAN, LEWIS &
BOCKIUS LLP
ATTORNEYS AT LAW
SAN FRANCISCO

DB2/22081003.4

EXHIBIT 172

HITACHI



A n n u a l R e p o r t **1 9 9 9**

Year ended March 31, 1999

(As of March 31, 1999)

JAPAN

MANUFACTURING

Babcock-Hitachi K.K.
Hitachi Cable, Ltd.
Hitachi Chemical Co., Ltd.
Hitachi Construction Machinery Co., Ltd.
Hitachi Denshi, Ltd.
Hitachi Electronics Engineering Co., Ltd.
Hitachi Hokkai Semiconductor, Ltd.
Hitachi Hometec, Ltd.
Hitachi Kiden Kogyo, Ltd.
Hitachi Maxell, Ltd.
Hitachi Media Electronics Co., Ltd.
Hitachi Medical Corporation
Hitachi Metals, Ltd.
Hitachi Seiko, Ltd.
Hitachi Telecom Technologies, Ltd.
Hitachi Tohbu Semiconductor, Ltd.
Hitachi Tokyo Electronics Co., Ltd.
Japan Servo Co., Ltd.

ENGINEERING, SALES, AND SERVICE

Chuo Shoji, Ltd.
Hitachi Air Conditioning & Refrigeration Co., Ltd.
Hitachi Auto Systems Co., Ltd.
Hitachi Building Systems Co., Ltd.
Hitachi Credit Corporation
Hitachi Electronics Services Co., Ltd.
Hitachi Engineering & Services Co., Ltd.
Hitachi Engineering Co., Ltd.
Hitachi Information Systems, Ltd.
Hitachi Keisho, Ltd.
Hitachi Life Corporation

Hitachi Plant Engineering & Construction Co., Ltd.
Hitachi Printing Co., Ltd.
Hitachi Semiconductor and Devices Sales Co., Ltd.
Hitachi Service & Engineering (East), Ltd.
Hitachi Service & Engineering (West), Ltd.
Hitachi Software Engineering Co., Ltd.
Hitachi Techno Engineering Co., Ltd.
Hitachi Transport System, Ltd.
Nissei Sangyo Co., Ltd.

ABROAD

MANUFACTURING

Hitachi Automotive Products (USA), Inc.
Hitachi Computer Products (America), Inc.
Hitachi Computer Products (Asia) Corp.
Hitachi Computer Products (Europe) S.A.
Hitachi Consumer Products (S) Pte. Ltd.
Hitachi Electronic Devices (Singapore) Pte. Ltd.
Hitachi Electronic Devices (USA), Inc.
Hitachi Home Electronics (America), Inc.
Hitachi Home Electronics (Europe) Ltd.
Hitachi Semiconductor (Europe) GmbH
Hitachi Semiconductor (Malaysia) Sdn. Bhd.
Shanghai Hitachi Household Appliances Co., Ltd.
Taiwan Hitachi Co., Ltd.

ENGINEERING, SALES, AND SERVICE

Hitachi America, Ltd.
Hitachi Asia Ltd.
Hitachi (China), Ltd.
Hitachi Data Systems Holding Corp.
Hitachi Europe Ltd.
Hitachi Semiconductor (America) Inc.

EXHIBIT 173

20-F 1 d20f.htm ANNUAL REPORT

Table of Contents

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

FORM 20-F

(Mark One)

- REGISTRATION STATEMENT PURSUANT TO SECTION 12(b) OR 12(g) OF THE SECURITIES EXCHANGE ACT OF 1934

OR

- ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the fiscal year ended March 31, 2008

OR

- TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from _____ to _____

OR

- SHELL COMPANY REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

Date of event requiring this shell company report _____

Commission file number: 1-8320

KABUSHIKI KAISHA HITACHI SEISAKUSHO

(Exact name of Registrant as specified in its charter)

Hitachi, Ltd.

(Translation of Registrant's name into English)

Japan

(Jurisdiction of incorporation or organization)

**6-6, Marunouchi 1-chome, Chiyoda-ku,
Tokyo 100-8280, Japan**
(Address of principal executive offices)

Legal Division; +81-3-3258-1111; +81-3-4564-2148; 6-6, Marunouchi 1-chome, Chiyoda-ku, Tokyo 100-8280, Japan

(Name, Telephone, Facsimile number and Address of Company Contact Person)

Securities registered or to be registered pursuant to Section 12(b) of the Act:

Title of each class	Name of each exchange on which registered
American depositary shares, or ADSs, each of which represents ten shares of common stock	New York Stock Exchange
Common stock without par value	New York Stock Exchange*

Securities registered or to be registered pursuant to Section 12(g) of the Act:

Table of Contents

C. Organizational Structure

The table below shows major subsidiaries of the Company as of March 31, 2008. Ownership percentage of voting rights indicates voting rights owned by the Company and its subsidiaries.

Name of company	Country of incorporation	Ownership percentage of voting rights
Information & Telecommunication Systems		
Hitachi Communication Technologies, Ltd.	Japan	100.0%
Hitachi Electronics Services Co., Ltd.	Japan	100.0
Hitachi Information & Control Solutions, Ltd.	Japan	100.0
Hitachi Information Systems, Ltd.	Japan	51.9
Hitachi-Omron Terminal Solutions, Corp.	Japan	55.0
Hitachi Software Engineering Co., Ltd.	Japan	53.0
Hitachi Systems & Services, Ltd.	Japan	51.2
Hitachi Computer Products (America), Inc.	U.S.A.	100.0
Hitachi Computer Products (Europe) S.A.S.	France	100.0
Hitachi Data Systems Holding Corp.	U.S.A.	100.0
Hitachi Global Storage Technologies Netherlands B.V.	Netherlands	100.0
Electronic Devices		
Hitachi Displays, Ltd.	Japan	50.2%
Hitachi High-Technologies Corporation	Japan	51.7
Hitachi Medical Corporation	Japan	63.2
Hitachi Display Device (Suzhou) Co., Ltd.	China	100.0
Power & Industrial Systems		
Babcock-Hitachi Kabushiki Kaisha	Japan	100.0%
Clarion Co., Ltd.	Japan	64.0
Hitachi Building Systems Co., Ltd.	Japan	100.0
Hitachi Construction Machinery Co., Ltd.	Japan	51.1
Hitachi Engineering & Services Co., Ltd.	Japan	100.0
Hitachi-GE Nuclear Energy, Ltd.	Japan	80.0
Hitachi Industrial Equipment Systems Co., Ltd.	Japan	100.0
Hitachi Mobile Co., Ltd.	Japan	100.0
Hitachi Plant Technologies, Ltd.	Japan	69.8
Hitachi Via Mechanics, Ltd.	Japan	100.0
Hitachi Automotive Products (USA), Inc.	U.S.A.	100.0
Hitachi Elevator (China), Co., Ltd.	China	70.0
Hitachi Power Europe GmbH	Germany	100.0
Digital Media & Consumer Products		
Fujitsu Hitachi Plasma Display Limited	Japan	95.4%
Hitachi Appliances, Inc.	Japan	100.0
Hitachi Maxell, Ltd.	Japan	53.5
Hitachi Media Electronics Co., Ltd.	Japan	100.0
Hitachi Home Electronics (America), Inc.	U.S.A.	100.0
Shanghai Hitachi Household Appliances Co., Ltd.	China	60.0

Table of Contents

Name of company	Country of incorporation	Ownership percentage of voting rights
High Functional Materials & Components		
Hitachi Cable, Ltd.	Japan	53.2%
Hitachi Chemical Co., Ltd.	Japan	51.6
Hitachi Metals, Ltd.	Japan	55.7
Logistics, Services & Others		
Chuo Shoji, Ltd.	Japan	100.0%
Hitachi Life Corporation	Japan	100.0
Hitachi Transport System, Ltd.	Japan	59.0
Nikkyo Create, Ltd.	Japan	100.0
Hitachi America, Ltd.	U.S.A.	100.0
Hitachi Asia Ltd.	Singapore	100.0
Hitachi (China), Ltd.	China	100.0
Hitachi Europe Ltd.	U.K.	100.0
Financial Services		
Hitachi Capital Corporation	Japan	60.6%
Hitachi Insurance Services, Ltd.	Japan	100.0

Note: Fujitsu Hitachi Plasma Display Limited changed its name to Hitachi Plasma Display Limited on April 1, 2008.

D. Property, Plants and Equipment

Hitachi owns a significant portion of the land, plants, offices and other fixed assets necessary to conduct its business and a significant portion of Hitachi's land, plants, offices and other fixed assets are located in Japan. Hitachi considers its properties to be well maintained and believes its plant capacity is adequate for its current needs and future plans. Certain of Hitachi's properties such as land and buildings are subject to mortgages in respect of bonds and loans. The total outstanding balance of the secured loans as of March 31, 2008 was ¥43,004 million.

The following table describes the name of the Company office, division, group, center or subsidiary that is using the property, the location and area of the property, and in the case of plant property, the principal products produced there as of March 31, 2008. Hitachi believes the following offices, divisions, groups, centers and subsidiaries comprise its major lines of business:

Name of user of plants and offices	Location	Land area (Thousands of square meters)	Principal products
In Japan			
The Company:			
Automotive Systems	Kanagawa, etc.	2,614	Automotive products
Information & Telecommunication Systems	Kanagawa, etc.	764	Software, mainframes
Thermal & Hydroelectric Systems Division, etc.	Ibaraki	3,831	Power generating equipment, turbines
Research & Development Group	Tokyo, etc.	836	—
Consumer Business Group	Kanagawa, etc.	1,018	Digital media related products
Sales Offices	Osaka, etc.	115	—
Urban Planning and Development Systems	Ibaraki	528	Elevators, escalators
Head Office	Tokyo	790	—
Transportation Systems Division	Yamaguchi	698	Railway vehicles

EXHIBIT 174

Panasonic Broadcast & Television Systems Company

Page: 1

INVOICE

RECEIVER ADDRESS
PANASONIC BROADCAST & TELEVISION SYSTEMS COMPANY
P.O. BOX 100420
Pasadena, CA 91189-0420

INVOICE NO.	INVOICE DATE
10256618	121396
ACCOUNT NO.	CUSTOMER NO.
1001033	1137364

CUSTOMER ORDER DATE
121096
CUSTOMER ID NUMBER
15165

SHIP TO ADDRESS
STUDIO SPECTRUM INC
1056 NORTH LAKE STREET
BURBANK, CA 91502

SHIP TO ADDRESS
STUDIO SPECTRUM INC.
1056 NORTH LAKE STREET
BURBANK, CA 91502
9000401 BR

TERMS OF SALE
NET 30 DAYS
NET DUE DATE
011197



ITEM DESCRIPTION	QUANTITY	DESCRIPTION	SHIPPED	WAREHOUSE	AMOUNT
1 CT1384VY 13" COLOR VIDEO MONITOR RECEIVER	1		1 451	305.00	305.00

UCLA Med.

LEAVE NOTE: If there are any discrepancies related to this invoice and/or the product or shipment covered by the invoice, please telephone 1-800-597-8007 between 9AM and 5PM East Coast Time. In the case of all confirmed errors we will issue credit to correct a billing error or issue a Return Authorization to correct an error in shipping within two business days of notification.

FOB WAREHOUSE	SALES TAX	SHIPPING CHARGES	44I
FOB WAREHOUSE NET	305.00	0.00	5.10

EXHIBIT PIE SS4

Deft. For Identification

Consisting of 13 Page(s)

Witness BUCKOWSKI

Date 7-16-13

SS0000001

Tami Le, CSR 8716

 Panasonic Broadcast & Television Systems Company

Page: 1

REMITTANCE ADDRESS
**PANASONIC BROADCAST &
 TELEVISION SYSTEMS COMPANY**
 P.O. BOX 100420

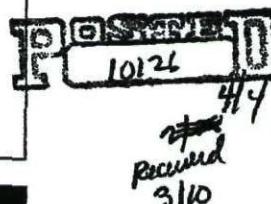
Pasadena, CA 91189-0420

INVOICE NO 0275972
 ACCOUNT NO 001033
 INVOICE DATE 022597
 OUR ORDER NO 1150170

CUSTOMER ORDER DATE 022597
 CUSTOMER P.O. NUMBER 15237

BILLED TO
STUDIO SPECTRUM INC
 1056 NORTH LAKE STREET

BURBANK, CA 91502



SHIP TO ADDRESS
STUDIO SPECTRUM INC.
 1056 NORTH LAKE STREET

 BURBANK, CA 91502
 9000401 BR

TERMS OF SALE
NET 30 DAYS
 NET DUE DATE
032697

CARRIER
N.W. Trans SHIPPING TERMS
 Prepaid and add

LINE	MODEL NUMBER DESCRIPTION	QUANTITY ORDERED	QUANTITY BACKORDERED	QUANTITY SHIPPED	SHIPPING WAREHOUSE	NET COST PER UNIT	TOTAL
1	POPBTH1350Y 13" COLOR VIDEO MONITO FOR OLYMPICS	10		10	745	563.00	5630.00

PLEASE NOTE: If there are any discrepancies related to this invoice and/or the product or shipment covered by the invoice, please telephone 1-800-597-8007 between 9AM and 5PM East Coast Time. In the case of all confirmed errors we will issue credit to correct a billing error or issue a Return Authorization to correct an error in shipping within two business days of notification.

FOB WAREHOUSE	SUB-TOTAL	SALES TAX	SHIPPING CHARGES	TOTAL INVOICE AMOUNT
FOB WAREHOUSE NET	5630.00	0.00	39.25	5669.25

INVOICE

SS0000003

anasonic Broadcast & Television Systems Company

Page: 1

REMITTANCE ADDRESS
**PANASONIC BROADCAST &
 TELEVISION SYSTEMS COMPANY**
 P.O. BOX 100420

Pasadena, CA 91189-0420

INVOICE NO. 10419572
 INVOICE DATE 072998
 ACCOUNTING 1001033
 OUR ORDER NO. 1240373

CUSTOMER ORDER DATE 072798
 CUSTOMER ID NUMBER 15657

INVOICE

SHIPPED TO
STUDIO SPECTRUM INC.
 1056 NORTH LAKE STREET
 BURBANK, CA 91502

SHIP TO ADDRESS
STUDIO SPECTRUM INC.
 1056 NORTH LAKE STREET
 BURBANK, CA 91502
 9000401 BF

TERMS OF SALE
NET 30 DAYS
 NET DUE DATE
 082898

11315 8/28

SHIPPING TERMS
UPS GROUND SERVICE
 SHIPPING TERMS
 Prepaid

LINE	MODEL NUMBER DESCRIPTION	QUANTITY ORDERED	QUANTITY BACKORDERED	QUANTITY SHIPPED	SHIPPING WAREHOUSE	NET COST PER UNIT	TOTAL
1	CT1386Y 13" MONITOR.	1		1	451	260.00	260.00

PLEASE NOTE: If there are any discrepancies related to this invoice and/or the product or shipment covered by the invoice, please telephone 1-800-597-8007 between 9AM and 5PM East Coast Time. In the case of all confirmed errors we will issue credit to correct a billing error or issue a Return Authorization to correct an error in shipping within two business days of notification.

PO#	WAREHOUSE#	SUB TOTAL	SALES TAX	SHIPPING CHARGE	TOTAL INVOICE AMOUNT
		260.00	0.00	6.18	266.18

SS0000008

EXHIBIT 175

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT))
ANTITRUST LITIGATION,)
) _____)
) _____)
This Document Relates to:)
) _____)
ALL ACTIONS.)
) _____)

30(b) (6) DEPOSITION OF STUDIO SPECTRUM, INC. -

KENNETH BUCKOWSKI

July 16, 2013

Tami L. Le, CSR No. 8716
 360860



BARKLEY
Court Reporters
barkley.com

(310) 207-8000 Los Angeles	(415) 433-5777 San Francisco	(949) 955-0400 Irvine	(858) 455-5444 San Diego
(916) 922-5777 Sacramento	(408) 885-0550 San Jose	(760) 322-2240 Palm Springs	(951) 686-0606 Riverside
(818) 702-0202 Woodland Hills	(212) 808-8500 New York City	(347) 821-4611 Brooklyn	(518) 490-1910 Albany
(516) 277-9494 Garden City	(914) 510-9110 White Plains	(312) 379-5566 Chicago	(702) 366-0500 Las Vegas
+33 1 70 72 65 26 Paris		+971 4 8137744 Dubai	+852 3693 1522 Hong Kong

12:26 1 Q Who paid for shipping for the CRT products that
2 you purchased from Panasonic?

3 A We would pay shipping from the warehouse unless
4 we achieved a certain volume level, and then they would
12:27 5 pay; one of the incentives of ordering more of the
6 product.

7 Q And was that the case for all of the CRT
8 product suppliers you purchased from or did it vary?

9 A I think all of them had the similar program.
12:27 10 (Studio Spectrum Exhibit 4 was marked for
11 identification.)

12 (Document handed to counsel and the deponent.)

13 MR. CUNNINGHAM: 1850?

14 THE REPORTER: Yes.

12:28 15 Q BY MR. CUNNINGHAM: Mr. Buckowski, you've been
16 handed what's been marked as Exhibit 1850. These are a
17 series of documents produced by Studio Spectrum in this
18 case. They have the Bates Nos. SS-1 through 13.

19 Take a moment to look at this, and when you're
12:28 20 ready, you can tell me if these are, indeed, invoices
21 produced by Studio Spectrum.

22 A (Reviewing document.)

23 Yes, these are the invoices from Studio
24 Spectrum -- or from our offices from Panasonic.

12:29 25 Q So let's look at the first page, SS-1. Do you

12:29 1 see in the upper left-hand corner in the box, it says
2 "Remittance Address" and lists Panasonic Broadcast &
3 Television Systems Company?

4 A Yes.

12:29 5 Q Is that the Panasonic entity that Studio
6 Spectrum purchased CRT products from?

7 A Yes, that's correct.

8 Q Okay. Do you know what the relationship is
9 between that entity and Panasonic Corporation?

12:29 10 A No, I don't know the legal definition of it.

11 Q These invoices, were these sent to you along
12 with the actual shipment of product?

13 A No, they were not; they followed.

14 Q You received it after you received the product?

12:30 15 A Yes.

16 Q And how were they sent to you?

17 A In the mail.

18 Q Were they typically one-page documents?

19 A They could be as many pages as the shipment was
12:30 20 or as the particular order was. I think that they came
21 actually as they shipped. There could be a large
22 purchase order; and whatever they had, they'd ship and
23 then back-order and fill it from there. Invoice
24 typically reflected the shipment, what came on a
12:30 25 particular shipment.

12:30 1 Q And do you see in the middle of this document
2 there's a stamp that says "Posted"?

3 A Yes.

4 Q Is that something that Studio Spectrum applied?

12:30 5 A Yes, that would have been Kathy's.

6 Q And when would she do that, in the process,
7 when in the process?

8 A That she posted it to the accounts payable
9 ledger, if you would, and that probably was done with
12:31 10 the Macola.

11 Q And the product reflected here is a -- in the
12 description, it says it's a 13-inch color video monitor
13 receiver.

14 A Uh-huh.

12:31 15 Q Correct?

16 A Yes.

17 Q So is that a -- is that a television?

18 A That's a television. But it's a television
19 designed for the industrial marketplace, so that meant
12:31 20 it had a gray case as opposed to a wooden case.

21 Q Any other differences between this product and
22 what you would think of as a typical television?

23 A Yep. It would have a grounded three-prong plug
24 as opposed to just the simple two-blade AC plug, and the
12:32 25 video inputs would typically have a professional B and C

12:32 1 connector rather than the consumer RCA. Also, typically
2 it had a longer warranty; if I recall, it was a one-year
3 parts and labor, and the consumer was 90 days. Those
4 were among the distinguishing differences between
12:32 5 consumer and industrial.

6 Q The warranty you reference there is the
7 warranty from the manufacturer?

8 A Yes, correct.

9 Q Do you see on the right-hand side in the box
12:32 10 that says "Shipping Terms"?

11 A Yes.

12 Q It says "Prepaid and add"?

13 A Yes.

14 Q Do you know what that means?

12:32 15 A I can see at the bottom that they're adding
16 freight into that, so in addition to \$305 cost of that,
17 they're adding \$5.10 for the freight.

18 Q I see. So you're looking down at the bottom of
19 the document.

12:32 20 A Yes. So that would have meant that they're
21 prepaying the freight and they're adding the freight
22 cost to our invoice.

23 Q So if there's a charge at the bottom of these
24 documents under Shipping Charges, does that mean that
12:33 25 Studio Spectrum is paying for shipping?

12:33 1 A Yes, that's correct.

2 Q Can you turn to the next page, please, Page 2.

3 A Okay.

4 Q And looking at the last line item here on the

12:33 5 invoice is a 13-inch high-grade monitor?

6 A Yes.

7 Q Do you know if that's a black-and-white

8 monitor?

9 A That would have been a color monitor.

12:33 10 Q How can you tell?

11 A I recognize the part number, one of my

12 children.

13 Q But there's nothing in the description there

14 that indicates it's color; right?

12:33 15 A No, just my familiarity with the model number.

16 Q Can you turn to the next page, please, Page 3?

17 A Yes.

18 Q And you see in the Description fields here, the

19 product is a 13-inch color video monitor; correct?

12:34 20 A Yes.

21 Q And it says "For Olympics"?

22 A Uh-huh. Yes.

23 Q What does that mean?

24 A Panasonic was the supplier of video equipment

12:34 25 for the Los Angeles Olympics in that year, and they had

12:34 1 a special category of -- they had given a lot of the
2 monitors for use at the Olympics. And after they were
3 finished, we were able to buy these at a reduced price.
4 These were used monitors, if you would, but very
12:34 5 high-quality ones. This would have been an example, I
6 think, of a special pricing.

7 Q Other than this Olympics example, can you think
8 of any other examples where you purchased CRT products
9 and got pricing reduced from the list price or from --
12:35 10 right, from the list price?

11 A I think this was the only time.

12 Q Can you turn to Page 8, please.

13 A (Witness complies.)

14 Q Page 8 is an invoice again for a 13-inch
12:35 15 monitor.

16 Do you know whether that's a black-and-white or
17 color monitor?

18 A That's a color. CT is color television.

19 Q Okay. You can put that aside.

12:36 20 (Studio Spectrum Exhibit 5 was marked for
21 identification.)

22 (Document handed to counsel and the deponent.)

23 Q BY MR. CUNNINGHAM: You've been handed what's
24 been marked as Exhibit 1851. It's a document produced
12:36 25 by Studio Spectrum, has the Bates numbers Studio

1 DEPOSITION OFFICER'S CERTIFICATE
2

3 STATE OF CALIFORNIA)
4 COUNTY OF ORANGE) ss.
5)
6)

7 I, TAMI L. LE, hereby certify:

8 I am a duly qualified Certified Shorthand
9 Reporter in the State of California, holder of
10 Certificate Number CSR 8716 issued by the Court
11 Reporters Board of California and which is in full force
12 and effect. (Fed. R. Civ. P. 28(a)).

13 I am authorized to administer oaths or
14 affirmations pursuant to California Code of Civil
15 Procedure, Section 2093(b), and prior to being examined,
16 the deponent was first duly sworn by me. (Fed. R. Civ.
17 P. 28(a), 30(f)(1)).

18 I am not a relative or employee or attorney
19 counsel of any of the parties, nor am I a relative or
20 employee of such attorney or counsel, nor am I
21 financially interested in this action. (Fed. R. Civ.
22 P. 28).

23 I am the deposition officer that stenographically
24 recorded the testimony in the foregoing deposition and
25 the foregoing transcript is a true record of the

1 testimony given by the witness. (Fed. R. Civ. P.
2 30(f)(1)).

3 Before completion of the deposition, a review of
4 the transcript [X] was [] was not requested. If
5 requested, any changes made by the deponent (and
6 provided to the reporter) during the period allowed, are
7 appended hereto. (Fed. R. Civ. P. 30(e)).

8

9 Dated: JUL 30 2013

10

11

12

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15

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TAMI L. LE
Certified Shorthand Reporter No. 8716, RPR

EXHIBIT 176



1 of 1 DOCUMENT

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LexisNexis® Corporate Affiliations

January 25, 2012

Panasonic Broadcast & Television Systems Company

1 Panasonic Way
Secaucus, NJ 07094-2917
United States

***** COMMUNICATIONS *****

TELEPHONE: (201) 348-7755

FAX: (201) 392-6910

URL: www.panasonic.com

E-MAIL: privacy@panasonic.com (General E-Mail)

OTHER NUMBERS: (800) 211-7262

***** COMPANY IDENTIFIERS *****

DCA NUMBER: 000020-149

***** COMPANY INFORMATION *****

LEGAL STATUS: Private

ORGANIZATION TYPE: Division

EMPLOYEES: 50

***** CORPORATE STRUCTURE *****

ULTIMATE PARENT: Panasonic Corporation 1006 Oaza Kadoma, Kadoma, Osaka, 571-8501, Japan

IMMEDIATE PARENT: Panasonic Corporation of North America 1 Panasonic Way, Secaucus, NJ, 07094-2917, United States

- Corporate Hierarchy

LexisNexis® Corporate Affiliations .,, Panasonic Broadcast & Television Systems Company

***** * EXECUTIVES * *****

Name	Title	Role
John Baisley	Pres	President

***** * DESCRIPTION * *****

INDUSTRY TYPE: Video & Audio Hardware & Software Products Distr

***** * MARKET AND INDUSTRY * *****

SIC CODES:

4841 - Cable and Other Pay Television Services

LOAD-DATE: January 25, 2012

EXHIBIT 177

Masonic Consumer Electronics Company
Unit of Matsushita Electric Corporation of America

Remittance Address
PANASONIC COMPANY CENTRAL
P.O. BOX 73277
CHICAGO, IL 60673-7277

BILL TO:
GENERAL ELECTRIC CAP CUG93

P O BOX 17459

JACKSONVILLE, FL 32245-7459

Absolutely no returns will be accepted unless shipped prepaid after receipt of prior written authorization. All other claims must be made within 10 days after receipt of merchandise by consignee.

Invoice Date:	Invoice Number:
080594	21918592
Account Number:	Control Number
4040000	11037042
	(3 RG:005 WHSE:601
Customer Service Contact:	
RADFORD FRANCES T.	

Ship To Address:
WETTSTEN'S
TERRY BEELER
215 NORTH 3RD ST.

LA CROSSE, WI 54601

Terms of Payment	Net Due Date	Order Date	Customer PO Number
22 DUE ON RECEIPT	083099	072799	64954

Panasonic Model Number	Quantity Ordered	B/C Quantity	Quantity Shipped	Gross Unit Price Discounts and Charges	Net Unit Price	Total
Customer Product Number						
3 CT-20G14	3		3	216.00 ✓	195.90	587.70
	SLMN RC					
KC89						
PDF					-43.04	
PERATE DEI					-3.00%	

P.O.# S4954
Log# 006
Rec Date 8-10-99
Rec Branch LAPR
G/L Acct# 1048.00
Approved By (600.30)
Entered by TB

Carrier YELLOW FREIGHT SYSTEMS	B/L Number P15540 PRO-NC 1227546119	Sub Total > Sales/Use Tax > Shipping Charges >	587.70 0.00 5.00
Shipping Terms Prepaid	Store Number 5000257 UNTIL 07/01/18	TOTAL INVOICE >	587.70

(Rev. 10/97)

~~ACENG 5000007 WETTIGEIN 10~~

EXHIBIT

WET0000029

EXHIBIT 178

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY Case No. 3:07-CV-5944 SC
TUBE (CRT) ANTITRUST MDL NO. 1917
LITIGATION,

This Document Relates to:

DIRECT PURCHASER PLAINTIFF ACTION

DEPOSITION OF
WETTSTEIN AND SONS, INC., THROUGH ITS DESIGNATED
REPRESENTATIVE DANIEL J. WETTSTEIN, TAKEN PURSUANT TO
RULE 30(B)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE
on Tuesday, July 9, 2013
Scheduled for 9:00 a.m.

Reported By: Lori Morrow, RPR, CRR, CLR

1 purchase its products directly from a price list like
2 this without negotiation of price or terms. Is that
3 correct?

4 A Yes.

5 Q How often was this sort of price list provided?

6 A As I said, it -- there could be monthly
7 changes. There could be 90-day changes. In the
8 television industry, volatility has remained. Changes.

9 (Deposition Exhibit Number 1809

10 was marked for identification.)

11 BY MR. HOYING:

12 Q You've been handed what's been marked as
13 Exhibit 1809. It's a document produced by Wettstein's in
14 litigation as WET0000029.

15 A Yes.

16 Q And it says at the top "Panasonic Consumer
17 Electronics Company." Do you see that?

18 A Yes.

19 Q Do you recognize this as an invoice from
20 Panasonic Consumer Electronics Company?

21 A Yes.

22 Q And the "Bill to" on this invoice is General
23 Electric CAF. Do you see that?

24 A Yes. It's GECAF.

25 Q And what was the relationship of that entity to

1 Wettstein's?

2 A GECAF held the paper. They were our finance
3 company when we would receive terms.

4 Q And did you pay a separate financing fee on
5 each order to GECAF?

6 A When we purchased the product, it was purchased
7 with any financing that was available to us through a
8 finance company.

9 Q Looking at this invoice, it has a customer
10 product number of CT-20, I think it's G14.

11 A Uh-huh.

12 Q Do you recognize that as a CRT product?

13 A Yes.

14 Q Do you know what type of CRT product it was?

15 A A 20-inch TV.

16 Q And what leads you to the conclusion that this
17 is a CRT product?

18 A The CT-20.

19 Q Did all of Panasonic's CRT television product
20 numbers start with a CT, or were you just having a
21 specific recollection of this individual product number?

22 A The only TV, to my recollection, that Panasonic
23 made at that time was a CRT.

24 Q Okay. There is a "Gross Unit Price" listed and
25 a "Net Unit Price." Do you see that?

1 A No, sir. Where is that at?

2 Q Going across the headings, in the box where we
3 just looked at the customer product number, there's a
4 "Quantity Ordered."

5 A Three.

6 Q "Quantity Shipped"?

7 A Three.

8 Q And then the next two columns are "Gross Unit
9 Price" and "Net Unit Price"?

10 A Yes.

11 Q What's the difference between the gross unit
12 price and the net unit price?

13 A The net unit price would have been the
14 extension that we would have paid from what I can see
15 from this, I believe.

16 Q The net unit price would have been net of all
17 discounts received? Is that what you mean?

18 A I do not know if it includes this DFI and PDF.

19 Q What is a PDF?

20 A Right offhand, I cannot recall.

21 Q Do you understand it to be a type of discount?

22 A It appears to be if the -- if it is taken off
23 of the total invoice at the bottom.

24 Q Okay. And the rebate DFI, do you understand
25 DFI to stand for deduct from invoice?

1 A Yes. Or discount from invoice is what we refer
2 to, yes.

3 Q What's your understanding of a discount from
4 invoice or deduct from invoice?

5 A It comes off of the final invoice price.

6 Q Okay. And there seems to be a stamp sort of in
7 the middle of that box with some handwriting in it. Do
8 you see that?

9 A Yes.

10 Q Do you recognize that stamp?

11 A Yes.

12 Q And what does that stamp represent?

13 A It would be our stamp. It shows the purchase
14 order number, the date received, the branch in our
15 computer, which is La Crosse.

16 Q Do you know what these numbers represent, the
17 \$648 and then the negative \$60.30?

18 MS. STEINER: Well, I'll object to your
19 characterization of those two entries as dollar
20 entries.

21 BY MR. HOYING:

22 Q And I will represent to you that if you add the
23 \$60.30 to the total invoice price at the bottom --

24 A Yes.

25 Q -- I believe you get the \$648, if that helps

1 figure out what those numbers might be.

2 A (Perusing document.) (Witness uses a
3 calculator.)

4 It totals the dollar amount which is written up
5 above of 216.

6 Q The 648 does?

7 A Yes.

8 Q Do you recognize this writing?

9 A Not the writing, but I recognize the initials.

10 Q And whose initials are those?

11 A Terry Beeler's.

12 Q And do you have any understanding of why she's
13 placed this \$216 above the 205, what that represents?

14 A Probably represents the cost before the
15 discounts. I don't know.

16 Q Okay. And do you know which of these costs or
17 unit price figures gets entered into the Tyler system as
18 the cost for the product?

19 A I would not recall in this particular case, no.

20 Q At the bottom under "Shipping Terms," it
21 says --

22 A Yes.

23 Q -- "prepaid." Do you see that?

24 A Yes.

25 Q What does prepaid mean in this context?

1 A The freight charges were not billed to
2 Wettstein's directly by the freight company.

3 Q And would Wettstein's have been charged
4 separately for any freight charges on this order?

5 A Doesn't appear, but it's an awful small
6 order --

7 Q And --

8 A -- unless it's part of a larger order.

9 Q If Wettstein's wasn't charged separately, that
10 would indicate that the freight charges were paid by the
11 supplier. Is that correct?

12 A I guess it depends on how one considers things
13 to be freight.

14 Q Wettstein's wouldn't be separately charged for
15 the freight in that instance?

16 A Not in this instance.

17 Q Are you familiar with a discount that would be
18 described as an MCA?

19 A Not to my recollection. M-, as in Mary, -C-A?

20 Q Yes.

21 A No, not right offhand. I can't think of an
22 acronym for that.

23 MR. HOYING: Will you mark this, please?

24 (Deposition Exhibit Number 1810

25 was marked for identification.)

1 REPORTER'S CERTIFICATE
2

3 STATE OF MINNESOTA)
4) ss.
5 COUNTY OF HENNEPIN)

6 I hereby certify that I reported the
7 deposition of WETTSTEIN AND SONS, INC., THROUGH ITS
DESIGNATED REPRESENTATIVE DAN WETTSTEIN, TAKEN
PURSUANT TO RULE 30(B)(6) OF THE FEDERAL RULES OF
CIVIL PROCEDURE on the 9th day of July, 2013, in
8 Minneapolis, Minnesota, and that the witness was by
me first duly sworn to tell the whole truth;

9 That the testimony was transcribed by me and
10 is a true record of the testimony of the witness;

11 That the cost of the original has been
charged to the party who noticed the deposition, and
12 that all parties who ordered copies have been
charged at the same rate for such copies;

13 That I am not a relative or employee or
attorney or counsel of any of the parties, or a
14 relative or employee of such attorney or counsel;

15 That I am not financially interested in the
action and have no contract with the parties,
attorneys, or persons with an interest in the action
that affects or has a substantial tendency to affect
17 my impartiality;

18 That the right to read and sign the
deposition by the witness was reserved.

19 WITNESS MY HAND AND SEAL, this 16th day of
20 July, 2013.

21
22
23
24 Lori L. Morrow, RPR, CRR, CLR
Notary Public, Hennepin County, Minnesota
25 My commission expires: January 31, 2015

EXHIBIT 179

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re: CATHODE RAY TUBE (CRT))
ANTITRUST LITIGATION)
) Case No.
) 07-5944SC
) MDL No. 1917
)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Tuesday, March 20, 2012

Location:

JAMS
Two Embarcadero Center, Suite 1500
San Francisco, CA 94111

25 Reported By: Donna J. Blum, CSR No. 11133

1 me, and I've forgotten the language.

2 MR. ALLIOTO: We will see to it that you've got
3 it.

4 HON. CHARLES LEGGE: I've got it. It's in my
5 cubicle. I've got it. But I wanted to make sure where
6 you were getting that language. That's from your own
7 complaint?

8 MR. ALLIOTO: From the most recent operative
9 complaint. It would have been end user complaint.

10 And that is very important because this group,
11 this direct group has completely different claim.
12 They're not subsumed within our class. They would have
13 to -- I don't know what would happen, but they would, I
14 assume, would have to realign claims under the state law.
15 And let me just say what the effect of that would be. It
16 would drastically reduce their case because, as your
17 Honor knows, under the state law not every thing has an
18 indirect purchaser statute.

19 HON. CHARLES LEGGE: I'm aware of the economic
20 impact on the case.

21 MR. ALLIOTO: Okay. Well, that is, I would go
22 so far as to say I don't even know if there would be a
23 case. But I'll leave that to other --

24 HON. CHARLES LEGGE: What you're telling me -- I
25 think what you're telling me is that were I to agree with